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6 Attorney for Defendant
7 TELUS INTERNATIONAL (U.S.) CORP.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 DAVID ISLAS, an Individual,
12 Plaintiff,

13 v.

14 TELUS INTERNATIONAL (U.S.)
CORP., a Foreign Corporation; DOES 1
15 Through 25, inclusive; and ROE
CORPORATIONS 1 Through 25,
16 inclusive,

17 Defendants.
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Case No.: 2:24-cv-02230-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME FOR DEFENDANT TO
FILE RESPONSIVE PLEADING**

[SECOND REQUEST]

19 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff DAVID ISLAS (“Plaintiff”) and Defendant
20 TELUS INTERNATIONAL (U.S.) CORP. (“Defendant”) by and through their undersigned
21 counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive pleading
22 from the current deadline of December 17, 2024, up to and including **December 24, 2024**.

23 Such extension is necessary in light of Plaintiff’s counsel trial schedule, the parties’ inability
24 to come to a resolution concerning the existence of an arbitration agreement as of Friday, December
25 13, 2024, and Defendant’s need to file a Motion to Compel Arbitration.

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1 This is the second request for an extension of time to respond to the Complaint in this
2 Court. This request is made in good faith and not for the purpose of delay.

3 Dated: December 17, 2024

Dated: December 17, 2024

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Paul H. Wolfram



7 PATRICK W. KANG, ESQ.
8 KYLE R. TATUM, ESQ.
9 PAUL H. WOLFRAM, ESQ.
10 KANG & ASSOCIATES, PLLC

Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON P.C.

Attorneys for Defendant
TELUS INTERNATIONAL (U.S.) CORP.

Attorney for Plaintiff
DAVID ISLAS

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12 **IT IS SO ORDERED.**

13 Dated: 12/19/2024.

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17 Hon. Maximiliano D. Couvillier III
18 U.S. MAGISTRATE JUDGE
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